DOCKET FILE COPY ORIGINAL

Waldo W. Anderson

STATE OF TEXAS, COUNTY OF HARRIS, SS:

BE IT REMEMBERED, That on this 18th day of January, 1995, before me, the undersigned a Notary Public in and for the County and State aforesaid, came Waldo W. Anderson, who is personally known to me to be the same person whose signature appears above and who states the following:

1. That he is the holder of a General Class Radiotelephone License # PG-15-5352 issued by the Federal Communications Commission at Denver, Colorado on January 2, 1985.

2. That he is presently employed as Director of Engineering and Operations for KUHT-TV, Channel 8, in Houston, Texas, licensed to the University of Houston Board of Regents.

3. That he is presently and has been previously known professionally as Andy Anderson.

4. That he is the author of a document entitled, in part: "COMMENTS OF ANDY ANDERSON IN CONNECTION WITH THE AMENDMENT OF PARTS 73 AND 74 OF THE COMMISSION'S RULES TO PERMIT UNATTENDED OPERATION OF BROADCAST STATIONS AND TO UPDATE BROADCAST STATION TRANSMITTER CONTROL AND MONITORING REQUIREMENTS."

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed my official seal on the day and year last above written.

Rebecca Welch
Notary Public

My Appointment Expires: 9-14-98

No. of Copies rec'd 029
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REBECCA WELCH
Notary Public, State of Texas
My Commission Expires 9-14-98

COMMENTS OF ANDY ANDERSON OF KUHT-TV, LICENSEE OF THE UNIVERSITY OF HOUSTON, HOUSTON, TEXAS, IN CONNECTION WITH THE AMENDMENT OF PARTS 73 AND 74 OF THE COMMISSION'S RULES TO PERMIT UNATTENDED OPERATION OF BROADCAST STATIONS AND TO UPDATE BROADCAST STATION TRANSMITTER CONTROL AND MONITORING REQUIREMENTS: MM DOCKET NO. 94-130

I, Andy Anderson, am presently employed as Director of Engineering and Operations for KUHT-TV, Channel 8, in Houston, Texas. I first received an FCC First Class Radiotelephone License in 1965, its General Class Radiotelephone License in 1985, and have been employed as a broadcast professional since 1966. I hold the Professional Broadcast Engineer certification of the Society of Broadcast Engineers and am a member of the Society of Motion Picture and Television Engineers and the Institute of Electrical and Electronic Engineers.

KUHT-TV is the nation's first public television station; it is licensed to the University of Houston System Board of Regents. Its license was first obtained so that low cost education might be made available to the citizens of Houston and the surrounding populace. As a high band VHF station, that potential exists for a radius of over sixty-five miles from our transmitting antenna located in southwest Houston. Like many PBS stations, our mission presently consists of providing general programming for our viewers: children and adult programs during the day, adult programs during prime time and late evening. From five to six am, we return to the original mission of the station by providing classroom education, as we present PBS Adult Learning courses in cooperation with the various community colleges in Houston. We are normally off the air from midnight or one o'clock in the morning to five am.

Two questions might well be asked: "Why do we no longer present educational programming developed by our licensee?" and "Why do we sign off for four to five hours every night?" Both questions have a very simple answer: economics. Like many non commercial stations, we raise most of our revenue locally from our viewing public, currently some 2.5 million viewers each week. We must therefore provide a viable service that our viewers are willing to pay for directly in order to pay our bills. The costs of operating a full

power television operation are presently too great to allow us to transmit programming which does not gather a general audience.

Very shortly we will begin an experiment for our licensee. Its Division of Continuing Education has obtained some moneys which will allow us to temporarily hire a part time duty operator who is experienced in broadcast presentation. For a time, we will transmit locally generated, for-credit college courses from normal sign-off to normal sign-on, even though we know in advance that such courses will draw only a small number of viewers. We will therefore be able to help the licensee with its outreach efforts. More importantly, we will be able to bring new educative opportunities to Houston's citizens.

Under the present rules, only minimal cost benefits would result from broadcast automation at KUHT. We would still have to provide a licensed operator to monitor transmission; an operator who at present also switches station breaks, loads tape machines and makes network recordings during the less busy times of the broadcast day. If unattended operation becomes a reality, however, we would have the option of diverting scarce capital resources to provide an automated operation during these periods. Financially it might become possible to provide needed programming for smaller audiences during parts of the day.

In practical terms, implementing unattended operation at KUHT-TV will require either a new transmitter or a new transmitter control or both. Unfortunately, we are unlikely to obtain funding for a new transmitter in the immediate future. With the proposed rules, however, a new transmitter control coupled with appropriate studio automated presentation equipment could well be appealing to management. Realistically, given our current viewing audience, we will probably not operate unattended during daytime or evening. With proper equipment, though, we could reassign duty operators so that one individual covers both total air presentation and network recording. Surplus human resources thereby obtained could very productively be diverted to assist local production.

Philosophically, the idea of unattended, but closely monitored, operation is very appealing. It has always seemed strange to me that we train our newest employees in Master Control. Master Control is the final point of quality assurance; it is the final chance to correct a defective image or sound before it is presented to our

audience. Since the advent of remote control, it is also the final place to correct a transmitter malfunction, most of the time. Logically, it should be the position occupied by the most experienced and knowledgeable operators in the station. In fact, this is very seldom the case. After observing operational procedures at many stations, however, I've concluded that local stations follow this process because their seasoned operators will no longer accept the tedium of Master Control. It seems to me, therefore, that changing the rules to encourage closer, non-human technical monitoring may well add a new dimension for the individuals charged with broadcast presentation. With proper technical implementation, the new rules may actually result in better air presentation and closer adherence to mandated standards than can be presently obtained locally.

I believe, though, that half measures will not suffice. If totally unattended operation is approved, it must include a solution for external events which does not require the station to lose air time unnecessarily. Receipt of an EBS message, for example, should not require the station to leave the air unless it is a true national emergency which currently might require this with an operator on duty. If a tower light goes out, it should likewise not take a broadcaster off the air. The distinction proposed, therefore, which differentiates between a condition which causes a broadcaster to interfere with another's spectrum and another condition which does not, I believe, is long overdue. Comparison of basic transmission frequencies to an NIST traceable standard at necessary intervals thus becomes as essential as any standard currently enforced. KUHT currently does this at monthly intervals, and I believe it is current practice among most stations in this market.

Finally, in the context of essential and nonessential factors, it would seem the Restricted Radiotelephone Permit should properly follow the dodo bird into extinction. Regulations which place a person with limited technical knowledge in total control of a full power broadcast transmitter but forbid the adjustment of a two watt microwave transmitter, defy logic.